



**REDEVELOPMENT AUTHORITY
OF THE
COUNTY OF MONTGOMERY**

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John F. Nugent, III, Executive Director

Alyson J. Fritzges, Solicitor

January 31, 2019

US EPA Headquarters
 William Jefferson Clinton Building
 1200 Pennsylvania Avenue, N.W.
 Washington, D.C. 20460

RE: Brownfields Community-Wide Assessment Grant Proposal
 Redevelopment Authority of the County of Montgomery, Pennsylvania

To Whom It May Concern:

1. Applicant Identification:
 Redevelopment Authority of the County of Montgomery, Pennsylvania
 104 W. Main Street, Suite 2
 Norristown, PA 19401
 DUNS Number: 013581249
2. Funding Requested:
 - a. Assessment Grant Type: Community-wide Assessment Grant.
 - b. Federal Funds Requested:
 - i. \$300,000.
 - ii. The Applicant is not requesting a Site-specific Assessment Grant waiver of the \$200,000 limit.
 - c. Contamination: Hazardous Substances and Petroleum; \$175,000 hazardous substances and \$125,000 petroleum.
3. Location: Pottstown, Montgomery County, Pennsylvania.
4. Property Information for Site-Specific Proposals: Not applicable.
5. Contacts:
 - a. Project Director:
 Pamela Finegan
pfinegan@montcopa.org
 (610) 275-5300
 Redevelopment Authority of the County of Montgomery, Pennsylvania
 104 W. Main Street, Suite 2
 Norristown, PA 19401

b. Chief Executive/Highest Ranking Elected Official:

John F. Nugent, III, Executive Director

jnugent@montcopa.org

(610) 275-5300

Redevelopment Authority of the County of Montgomery, Pennsylvania

104 Main Street, Suite 2

Norristown, PA 19401

6. Population: Borough of Pottstown: 22,377 (2010 Census)

7. Other Factors Checklist: The following items apply to the proposed project:

Other Factors	Page #
Community Population is 10,000 or less.	
The applicant is, or will assist, a federally recognized Indian tribe or United States territory.	
The priority brownfield site(s) is impacted by mine-scarred land.	
The priority site(s) is adjacent to a body of water (i.e., the border of the priority site(s) is contiguous or partially contiguous to the body of water, or would be contiguous or partially contiguous with a body of water but for a street, road, or other public thoroughfare separating them).	1 - 2
The priority site(s) is in a federally designated flood plain.	2
The redevelopment of the priority site(s) will facilitate renewable energy from wind, solar, or geothermal energy; or any energy efficiency improvement projects.	
30% or more of the overall project budget will be spent on eligible reuse planning activities for priority brownfield site(s) within the target area.	

8. Letter from the State or Tribal Environmental Authority: A current letter from the Pennsylvania Department of Environmental Protection acknowledging that the applicant plans to conduct assessment activities and is planning to apply for FY19 federal brownfields grant funds is attached.

If you have any questions regarding this proposal, feel free to contact me.

Sincerely,



John F. Nugent, III
Executive Director

Attachment



December 14, 2018

Mr. John F. Nugent,
Executive Director
Redevelopment Authority of the County of Montgomery
104 W. Main Street
Suite 2
Norristown, PA 19401

RE: USEPA Brownfields Assessment Proposal | State Letter of Acknowledgement
Pottstown Sites
City of Pottstown, Montgomery County, Pennsylvania

Mr. Nugent:

The Pennsylvania Department of Environmental Protection (DEP) is pleased to support your efforts to redevelop brownfield properties in your community. Returning underutilized lands to productive use improves our environment, safeguards our residents, and helps boost Pennsylvania's economy.

The DEP supports Redevelopment Authority of the County of Montgomery's application for a \$300,000 Brownfields Community-Wide Assessment Grant from the United States Environmental Protection Agency (USEPA) for hazardous substances and petroleum. These funds will be used to focus on target brownfields sites located in Pottstown, Pennsylvania.

Redevelopment Authority of the County of Montgomery's work to re-examine and restore lands damaged by historic mining practices adds to the revitalization of communities in the northeast region. It creates renewed neighborhoods and business districts in Pennsylvania and is a worthwhile endeavor. Both Central Office and Regional Office Staff in the Land Recycling Program look forward to supporting Redevelopment Authority of the County of Montgomery and USEPA Region 3 on this project.

If you have any questions, please contact John Gross by email at johngross@pa.gov or by telephone at 717-783-7502.

Sincerely,

A handwritten signature in black ink, appearing to read "Troy Conrad".

Troy Conrad
Director
Bureau Environmental Cleanups and Brownfields

1. PROJECT AREA DESCRIPTION AND PLANS FOR REVITALIZATION

1.a. Target Area and Brownfields

1.a.i. Background and Description of Target Areas: The Borough of Pottstown (Pottstown or Borough) is a small, long-urbanized community with a population of 22,377, located in Montgomery County, Pennsylvania (County) on the Schuylkill River. During its peak economic period in the early and middle 20th century, Pottstown was the vibrant home to numerous steel mills, furnaces, textile mills, bridge works, machine shops, and foundries. Fortune 500 industrial and manufacturing employers such as Firestone and Bethlehem Steel established large-scale operations in Pottstown and employed thousands of workers. By 1980, Pottstown's economic fortunes were in grave decline, with both Firestone and Bethlehem Steel ceasing operations. Catastrophic unemployment and enormous abandoned and contaminated industrial properties throughout Pottstown resulted. Approximately 31,000 people live within two miles of Pottstown's former industrial corridor, and there are 25 schools and day-care centers within a 2-mile radius of the Borough. Many of the sites targeted for grant funding are located immediately adjacent to, and jeopardize water quality of, the Schuylkill River (publicly voted the 2014 "Pennsylvania River of the Year") and 1.7 million citizens live downstream of these abandoned properties. Soil and groundwater quality at these properties has been severely impacted by hazardous substances and petroleum products from nearly 200 years of industrial operations and now pose a direct threat to both human health and the environment.

The Redevelopment Authority of the County of Montgomery (MCRDA) will administer the U.S. Environmental Protection Agency (US EPA) Assessment Grant and will focus on providing an avenue for Pottstown's participation in the County's economic vitality, identifying meaningful redevelopment opportunities, and supplementing private sector and state-funded efforts. MCRDA will work closely with Pottstown Area Industrial Development, Inc. (PAID) to identify priority sites where environmental assessments and cleanup planning will have immediate positive impacts on Pottstown's revitalization efforts. While Assessment Grant funding will be available for use at projects throughout Montgomery County, efforts will be focused on three specific target areas in Pottstown:

- **Keystone Employment & Economic Plan (KEEP) Project Site:** A 255-acre area within Pottstown's Riverfront Industrial Corridor consisting of 13 derelict, abandoned, and underutilized commercial and industrial properties. MCRDA anticipates that Assessment Grant funding will primarily focus on this target area. This area has excellent highway access as well as access to the Norfolk Southern freight railroad. The Schuylkill River is located immediately to the south, and one of the most beloved pedestrian/bicycle trails in Pennsylvania, the Schuylkill River Trail (SRT), runs through the middle of the KEEP project Site. Assessment and cleanup costs within this target area alone have been projected to exceed well over \$1 million. Pottstown, West Pottsgrove Township, and County officials are working collaboratively to create a new and vibrant mixed-use employment center that will maximize the redevelopment area's potential through public and private partnerships.
- **Former Bethlehem Steel Site/Pottstown Industrial Complex:** Bethlehem Steel conducted operations within this 100-acre redevelopment target area from the early 1900s through 1980. This site was previously acquired by Pottstown Industrial Complex, L.P. (PIC), who has subsequently redeveloped approximately 400,000 square feet of the site for job-creating businesses. PIC plans to transform the remaining acreage into the "*Pottstown Industrial Complex*," which will house manufacturing and warehousing space and should directly result

in the creation of several hundred new jobs for both skilled and unskilled labor. Soil and groundwater contamination (chromium, lead, and other metals) have been identified at the property, however, and must be further characterized for redevelopment and environmental risk management purposes.

- **Town Core Sites:** Multiple abandoned, vacant or underutilized parcels are located along or in the vicinity of College Drive and Industrial Highway in Pottstown's core near the Schuylkill River. These properties are ideally suited for residential, commercial/light industrial and recreational uses. Although there is considerable interest in these sites, known or suspected environmental impacts have historically been a major deterrent to redevelopment efforts.

1a.iii. Description of the Priority Brownfield Site(s): The approximately 30-acre former **Stanley G. Flagg Brass Company Site**, which was originally the site of the famed Pottstown Iron Works, is located within the KEEP Project Site and housed industrial operations from the 1850s until 1997. The site remains vacant with poorly characterized contaminated soils containing metals, semi-volatile organic compounds and petroleum substances presenting a potential health risk to the community and liability risk to developers. As one of the largest properties in the KEEP Project Site, assessment and cleanup planning activities leading to the redevelopment of this priority site are critical to create forward momentum and increase developer interest in this target area. The Site is adjacent to the Schuylkill River, and large portion of the Site lies within the 1-percent chance flood plain.

The **Contrast Metals Site** is a 4-acre property located within the former Bethlehem Steel/PIC target area. Potential contamination associated with steel production and a former petroleum storage tank are complicating site redevelopment.

The 4-acre **Pottstown Plating Works Site** is located at the northwest corner of the intersection of S. Washington Street and Industrial Highway in Pottstown adjacent to the Schuylkill River (within the 1-percent chance flood plain and separated only by Industrial Highway and a railroad right-of-way) and is part of the Town Core Sites target area. The property contains a 46,500-square foot industrial building that is currently vacant. Pottstown Plating Works operated at the site and conducted metal electroplating operations for nearly 60 years, from 1950 to 2009. Phase I and II environmental site assessments (ESAs) funded by an existing US EPA Assessment Grant have identified chlorinated solvents and metals in soil and groundwater at this site. Although there is currently strong developer interest in the property, additional assessment and cleanup planning are necessary to facilitate remediation and redevelopment. Anticipated future uses of this site include commercial or light industrial with significant job creation potential.

1.b. Revitalization of the Target Areas

1.b.i. Redevelopment Strategy and Alignment with Revitalization Plans: To counter its economic decline and revive this low-income community through investment and sustainable growth, Pottstown has embarked on a carefully planned, strategic revitalization process. In March 2008, the *Pottstown Economic Development Strategic Plan*¹ was prepared. The *Strategic Plan* recognized as a key finding that "one legacy of Pottstown's industrial past was the presence of an industrial infrastructure that, with some improvement, could once again make Pottstown an attractive business location." A key observation of an Urban Land Institute (ULI) *Advisory Services Panel Report* in

¹ <https://paidinc.org/downloads/EconomicDevelopmentStrategicPlan.pdf>

October 2009², was that the sites of former large manufacturers, specifically Bethlehem Steel, were under-occupied. New economic development, downtown revitalization, underutilization of existing industrial space, and crime were key challenges identified in the ULI report.

Pottstown Borough and West Pottsgrove Township developed a *Memorandum of Understanding* (MOU) in 2013 to promote economic development on the KEEP project site with the expressed goal being to create a new and vibrant employment center that maximizes the redevelopment area's potential through public-private partnerships. Most recently, in May 2018, Pottstown and West Pottsgrove published the *KEEP Specific Plan*³ that provides a vision of "what is possible" for redevelopment of the area. The *KEEP Specific Plan* presented a development concept that is endorsed by the governing bodies of both Pottstown and its neighbor. The conceptual plan includes a mixture of light industrial/manufacturing, office, research & development, and residential uses.

1.b.ii. Outcomes and Benefits of Redevelopment Strategy: There is tremendous economic stimulation potential associated with implementation of the revitalization plans for the target areas following successful cleanup. As stated in the *Specific Plan*, the Montgomery County Planning Commission (MCPC) has estimated that the total annual fiscal impacts from the KEEP project alone would be approximately \$10 million. This estimate includes generation of the following revenue: \$4.59 million for the Pottstown School District, \$3.21 million for the Pottsgrove School District, \$1.21 million for Pottstown Borough, \$212,000 for West Pottsgrove Township and \$698,000 for Montgomery County. MCPC calculations presented in the *Specific Plan* predict that the KEEP project alone will result in approximately 5,400 jobs created. Several hundred jobs are also predicted to be created upon successful assessment, cleanup, and redevelopment of the Bethlehem Steel/PIC and Town Core sites.

The recently enacted federal "Tax Cuts and Jobs Act" created the Qualified Opportunity Zone (QOZ) program, which offers tax benefits to investors for investing capital gains in low-income census tracts. Because Pottstown qualifies as a QOZ⁴, investors are likely to benefit from the financial incentives offered by this program.

The Schuylkill River and its recreational opportunities lie adjacent to or near many of the Pottstown priority sites. Improving public access to the river as well as expansion and linkage of existing and future pedestrian trails to the SRT are important components of Pottstown's revitalization efforts. Preservation of greenspace and creation of parks is another priority associated with redevelopment.

1.c. Strategy for Leveraging Resources

1.c.i. Resources Needed for Site Reuse: US EPA grant funds often remove initial hurdles and stimulate the availability of additional resources for environmental assessment and remediation. As MCRDA has done in the past, a variety of additional financial resources will be used to support assessment activities, remediation and redevelopment efforts to close funding gaps. These available funding sources include the Montgomery County Economic Development Program, the Pennsylvania's Industrial Sites Reuse Program (PA ISRP), MCRDA's Brownfields Program, which is funded with program income from a closed US EPA RLF grant and private capital, which MCRDA often requires of grant or loan recipients as a cost-share. Additional resources can be tapped, as MCRDA has in the past, to complete project financing that cannot be privately funded.

² <https://paidinc.org/downloads/ULI%202009report.pdf>

³ https://paidinc.org/press_docs/Keystone_Employment_and_Economic_Plan_Upd_8-30-18.pdf

⁴ <https://dced.pa.gov/programs-funding/federal-funding-opportunities/qualified-opportunity-zones/>

These programs include: Pennsylvania's Business In Our Sites Grant/Loan Program; Industrial Development Program; Brownfields to Playfields Program; Local Tax Increment Financing; Pennsylvania Gaming Local Share Account (LSA) program and the federally funded Energy Works Loan Program.

1.c.ii. Use of Existing Infrastructure: Pottstown's industrial history spans centuries and has produced an infrastructure that continues to make the Borough a prime location for conducting business in today's global economy. The existing industrial infrastructure and recent investments are a tremendous asset. Major utilities are available for users of the KEEP Project Site although some improvements are still needed. The public water and sanitary sewer system have adequate capacity to serve future development of the project site consistent with the concepts proposed in the *Specific Plan*. Necessary infrastructure work includes the extension of Keystone Boulevard, extension of water and sewer lines, railroad siding construction and stormwater management system upgrades. Potential funding sources for these upgrades include private capital, PA Department of Transportation (PennDOT) grants, and PA Department of Community and Economic Development (DCED) Multi-modal Transportation Fund grants.

2. COMMUNITY NEED AND COMMUNITY ENGAGEMENT

2.a. Community Need

2.a.i. The Community's Need for Funding: The economic impact of the brownfields sites in Pottstown is severe. Both County and Borough stakeholders have acknowledged that brownfields revitalization will play an instrumental role in reversing the economic decline of this economically challenged, "left behind" community. Upon close inspection, Pottstown's economic statistics present significant concerns. Pottstown's job growth rate was just over 1% between 2000 and 2010 compared to a 2.65% increase in Montgomery County. Pottstown's population grew very little over the past 10 years (2.4%) while the County's population grew nearly 7%. Without intervention and significant funding, Pottstown's population is anticipated to increase by just 6.8% by 2045, while Montgomery County's population is projected to increase by nearly 14%. The Borough's very low per capita income (\$22,648 compared to \$40,076 for Montgomery County) and median household income (\$43,311) translates into a distinctly lower expenditure potential within the community, which has the cascading effect of limiting employment, wealth creation, and commercial growth opportunities.

Given Pottstown's relatively small population (22,377)⁵, on a per capita basis, the sheer number of brownfields sites within the Borough is quite significant and crippling. From an acreage standpoint, Pottstown's target-area brownfields sites (\pm 375 acres) total approximately 10% of the Borough's area and represent a major burden in the form of lost tax revenue, depressed property values, ongoing costs to acquire and maintain vacant properties, and increased demand on municipal services. Assessment leading to redevelopment of the priority sites will provide the community with much-needed vitality by creating employment opportunities, increased tax revenue, commercial activity, a sense of community pride, and recreational opportunities.

2.a.ii. Threats to Sensitive Populations: A disproportionate impact, from a health, welfare and economic perspective, has been inflicted on the community. Pottstown's minority population comprises 31.3% of the total⁶. The Pottstown target areas represent some of the highest environmental-justice priorities and community interest areas within the region. Residents have

⁵ Statistics in this paragraph from MCPC Data Portal: <http://webapp.montcopa.org/planning/dataportal/Introduction.asp>

⁶ <https://www.census.gov/programs-surveys/decennial-census/data/datasets/2010.html>

long expressed concerns regarding higher than normal cancer rates and other potential environmentally-induced illnesses in their community. The Pottstown Area Health and Wellness Foundation (PAHWF) conducted a health assessment of the Borough and the communities within a 10-mile radius of Pottstown in 2003, 2008, and 2013. The results of the 2013 assessment were published in the November 2013 *Tri-County Area Community Health Needs Assessment*⁷. According to the *Needs Assessment*, the health of Pottstown Borough adults and children is substantially worse than the health of residents of the Tri-County Area as a whole. In addition, within the entire PAHWF service area, Pottstown Borough had the highest percentage of families with children living in poverty (13.8%). The 2013 *Needs Assessment* also reported the following statistics for Pottstown Borough:

- Fair to poor health status among adults is nearly three times as common in Pottstown Borough (20.4%) as in neighboring areas (7.2%).
- Pottstown Borough children are more likely to be in fair to poor health (5.4%) compared to children in the Tri-County Area overall (2.3%).
- The highest overall age-adjusted mortality rate in the Tri-County Area (1,075.5 per 100,000), and the highest age-adjusted mortality rates from all cancers (231.1), heart disease (144.4), motor vehicle accidents (99.4), lung cancer (65.5), and stroke (66.8).
- The highest rate of child obesity (26.5%) among the seven sub-areas.
- Many adults and children in Pottstown Borough are overweight or obese and lack sufficient physical activity and good nutritional habits to maintain healthy body weight.
- Pottstown Borough adults and children are much more likely to be in poor health and experience economic and cultural barriers to health care.

It is evident that Pottstown is an economically-challenged, community struggling with many of the disadvantages faced by other low-income, minority communities throughout the nation including disproportionate health issues. The presence of numerous brownfields sites compounds the problems faced by community members. Assessment of the priority sites, ultimately leading to cleanup, will result in a reduction of contaminated, industrial properties and will help protect the health and well-being of Pottstown's residents. In addition, the creation of additional parks and recreational space will encourage Pottstown residents to become more active; a critical first step in addressing some of the area's major health issues and challenges such as obesity.

2.b. Community Engagement

2.b.i. Community Involvement MCRDA will actively coordinate and team with local community partners who will have meaningful involvement with site selection and assessment, remediation, and reuse planning. PAID, PAHWF, the TriCounty Area Chamber of Commerce (TCACC), the Latin American Community Action of Montgomery County (ACLAMO), and the Schuylkill River Greenways National Heritage Area (SRG NHA) have been identified as initial community partners with others to be engaged as projects progress.

⁷ http://www.pottstownfoundation.org/PDFs/Pottstown-CHNA-FINAL_to-print-copy-110513.pdf

Local Community Partners		
Partner Name	Point of Contact	Specific Role in Project
PAID	Peggy Lee-Clark (610) 326-2900 pleeclark@paidinc.org	Assist with overall program implementation including site selection, marketing, community outreach and resource leveraging.
TCACC	Eileen S. Dautrich (610) 326-2900 eileen@tricityareachamber.com	Help to promote the Brownfields Program by providing outreach and marketing to members and the community.
PAHWF	David W. Kraybill (610) 323-2006 davek@pottstownfoundation.org	Provide information and consultation relative to known health risks, sensitive populations and threats to human health in the community. PAHWF also provides grants which may be available to fund certain aspects of redevelopment projects.
ACLAMO	Nelly Jimenez-Arevalo (610) 277-2570 nellja@aclamo.org	Provide community outreach and education assistance.
SRG NHA	Elaine Paul Schaefer (484) 945-0200 eschaefer@schuylkillriver.org	Provide environmental education assistance and consultation regarding protection of the river and trail systems.

2.b.ii. **Incorporating Community Input:** MCRDA will develop a Community Engagement Plan consisting of initiatives designed to involve and engage the affected community. Program information and periodic progress updates (quarterly or more frequently if necessary) will be posted on MCRDA and PAID websites and through social media. Publicly advertised outreach meetings with sensitive populations will be hosted as needed and key project stakeholders will be invited to attend. Prior to and during these meetings, community input will be solicited and will be factored into the project decision-making process.

3. TASK DESCRIPTIONS, COST ESTIMATES AND MEASURING PROGRESS

3.a. Description of Tasks and Activities

Task 1 Community Outreach and Marketing: This task includes activities that engage and inform community members about the US EPA-funded brownfield opportunities and program/project-specific updates. Preparation of a community engagement plan is included. A steering committee consisting of MCRDA, PAID and local community representatives will be regularly convened to discuss and guide site selection. Funds will also be used for an MCRDA representative to attend the National Brownfields Conference or other redevelopment educational forums. This task will be led by MCRDA with assistance from the Qualified Environmental Professional (QEP) and other community partners. Activities associated with this task will be conducted throughout the 3-year performance period.

Task 2 Financial and Performance Reporting: Includes recording and processing financial and contractual transactions. The performance reporting component primarily involves preparation and submission of required reports to US EPA and postings to the Assessment, Cleanup, and Redevelopment Exchange System ACRES database. This task will be led by MCRDA with QEP assistance and will be conducted throughout the performance period.

Task 3 Phase I ESAs: Phase I ESAs will be conducted in accordance with ASTM 1527-13 and the federal All Appropriate Inquiry (AAI) standards. This task will be led by the QEP. Phase I ESAs will primarily be conducted during the first two years of the performance period.

Task 4 Phase II ESAs: Phase II ESAs will be completed at candidate sites. A program-wide Quality Assurance Project Plan (QAPP) will be prepared and submitted to US EPA for review before conducting Phase II field activities. Site-specific Sampling and Analysis Plans (SAPs) will also be prepared and submitted to US EPA for review and approval. This task will be led by the QEP and will primarily be conducted during the last 2 years of the grant performance period.

Task 5 Reuse and Remediation Planning: Cleanup and reuse plans that will affect sustainable development while making the community more attractive, economically stronger, and more socially diverse will be prepared. This task will be a joint effort between MCRDA and the QEP with local community involvement and is expected to occur during the final year of the performance period.

3.b. Cost Estimates and Outputs

The proposed Brownfields Assessment Grant budgets are:

Budget Categories	Project Tasks for Hazardous Substances Sites					
	Task 1 - Community Outreach and Marketing	Task 2 - Financial & Performance Reporting	Task 3 - Phase I ESAs	Task 4 - Phase II ESAs	Task 5 - Reuse & Remediation Planning	Total
Personnel	\$ 18,375	\$ 12,000	\$ -	\$ -	\$ 3,975	\$ 34,350
Fringe Benefits	\$ 6,431	\$ 4,200	\$ -	\$ -	\$ 1,391	\$ 12,023
Travel	\$ 3,991	\$ -	\$ -	\$ -	\$ -	\$ 3,991
Supplies	\$ 1,994	\$ 1,302	\$ -	\$ -	\$ 431	\$ 3,727
Contractual	\$ 7,700	\$ 5,610	\$ 21,000	\$ 62,000	\$ 24,600	\$ 120,910
Total	\$ 38,491	\$ 23,112	\$ 21,000	\$ 62,000	\$ 30,398	\$ 175,000

Budget Categories	Project Tasks for Petroleum Sites					
	Task 1 - Community Outreach and Marketing	Task 2 - Financial & Performance Reporting	Task 3 - Phase I ESAs	Task 4 - Phase II ESAs	Task 5 - Reuse & Remediation Planning	Total
Personnel	\$ 13,425	\$ 8,250	\$ -	\$ -	\$ 3,525	\$ 25,200
Fringe Benefits	\$ 4,699	\$ 2,888	\$ -	\$ -	\$ 1,234	\$ 8,820
Travel	\$ 2,346	\$ -	\$ -	\$ -	\$ -	\$ 2,346
Supplies	\$ 1,457	\$ 895	\$ -	\$ -	\$ 382	\$ 2,734
Contractual	\$ 5,500	\$ 4,400	\$ 14,000	\$ 45,000	\$ 17,000	\$ 85,900
Total	\$ 27,426	\$ 16,433	\$ 14,000	\$ 45,000	\$ 22,141	\$ 125,000

*Fringe Benefits calculated at 35% of Personnel costs, and Supplies calculated at 10.85% of Personnel costs.

Hazardous Substances Sites Budget:**Task 1 Community Outreach and Marketing:**

Personnel Costs: 245 hours at average rate of \$75/hour = \$18,375.

Travel: MCRDA attendance at National Brownfields Conference = \$3,991.

Contractual Costs: 70 hours at average rate of \$110/hour = \$7,700.

Task 2 Financial and Performance Reporting:

Personnel Costs: 160 hours at average rate of \$75/hour = \$12,000.

Contractual Costs: 51 hours at average rate of \$110/hour = \$5,610.

Task 3 Phase I ESAs:

Contractual Costs: Phase I ESAs for approximately six eligible sites at an average cost of \$3,500 per site = \$21,000.

Task 4 Phase II ESAs:

Contractual Costs: Phase II ESAs for approximately three eligible sites at an average cost of \$20,667 per site = \$62,000.

Task 5 Reuse and Remediation Planning:

Personnel Costs: 53 hours at average rate of \$75/hour = \$3,975.

Contractual Costs: Preparation of cleanup plans for two eligible sites at an average cost of \$12,300 per site = \$24,600.

Petroleum Substances Sites Budget:**Task 1 Community Outreach and Marketing:**

Personnel Costs: 179 hours at average rate of \$75/hour = \$13,425.

Travel: MCRDA attendance at state brownfield or redevelopment conference = \$2,346.

Contractual Costs: 50 hours at average rate of \$110/hour = \$5,500.

Task 2 Financial and Performance Reporting:

Personnel Costs: 110 hours at average rate of \$75/hour = \$8,250.

Contractual Costs: 40 hours at average rate of \$110/hour = \$4,400.

Task 3 Phase I ESAs:

Contractual Costs: Phase I ESAs for approximately four eligible sites at an average cost of \$3,500 per site = \$14,000.

Task 4 Phase II ESAs:

Contractual Costs: Phase II ESAs for approximately two eligible sites at an average cost of \$22,500 per site = \$45,000.

Task 5 Reuse and Remediation Planning:

Personnel Costs: 47 hours at average rate of \$75/hour = \$3,525.

Contractual Costs: Preparation of cleanup plans for two eligible sites at an average cost of \$8,500 per site = \$17,000.

3.b. Measuring Environmental Results

Key Program activities will be carefully planned, implemented and evaluated to ensure that grant funds are successfully utilized within the 3 year performance period. The QEP will assist MCRDA with program and project status tracking. At least quarterly, and more frequently if warranted, project outputs, results and outcomes will be tracked and evaluated against the Cooperative Agreement and the project schedule to ensure that grant funds are being expended in a timely and efficient manner. In addition, MCRDA will communicate frequently with the US EPA Project Officer; this communication will help expedite project tasks and provide the Project Team with valuable guidance from US EPA.

4. PROGRAMMATIC CAPABILITY AND PAST PERFORMANCE

4.a. Programmatic Capability

4.a.i. Organizational Structure The Brownfield Assessment Program will be managed by MCRDA, an organization with a proven track record of administering state and federal grant programs with total assets of more than \$60 million, along with assistance from PAID. MCRDA will provide strategic and tactical direction regarding the use of US EPA funds and will evaluate prospective sites for consistency with Program goals, active living, and smart-growth principles. MCRDA is supported by qualified volunteers and unpaid local business professionals, allowing it to be modestly staffed with two full-time employees and contract workers. Mr. John F. Nugent serves as the Executive Director and Fund Manager and Ms. Pamela Finegan serves as Program Administrator. MCRDA operates with a five-member Board with staggered 5-year terms. Through its competitive bidding process that is compliant with applicable federal, state, and local procurement requirements, MCRDA will select an environmental consulting firm with extensive brownfield remediation and redevelopment experience and technical expertise to serve as the QEP. The QEP will conduct or oversee environmental site assessments and be involved with cleanup planning at sites selected for funding under the Program.

4.a.ii. Acquiring Additional Resources: MCRDA is extremely well positioned to acquire additional expertise and resources to successfully implement the Brownfield Assessment Program, if necessary. Both MCRDA and PAID representatives have decades of professional experience working in the County and have extensive business relationship networks. Procurement systems are in place that allow MCRDA to solicit bids and select subcontractors and subrecipients in a timely manner.

4.b. Past Performance and Accomplishments

4.b.i. Currently Has or Previously Received an EPA Brownfields Grant: MCRDA is currently successfully implementing a US EPA RLF grant (Grant Number 96323001). US EPA initially awarded \$800,000 in 2013 with supplemental awards of \$450,000 and \$500,000 in 2016 and 2018, respectively. To date, MCRDA has issued loans totaling \$1,059,250 for five high-impact cleanup projects in the County including one in Pottstown. At two of the completed projects alone, over 100 full-time jobs have been created. MCRDA is currently evaluating sites and applications to determine the best use of the 2018 supplemental funding before grant expiration in 2021.

MCRDA is also administering a 2015 \$400,000 community-wide US EPA Brownfields Assessment Grant (Grant Number 96337701). To date, MCRDA has conducted community outreach and engagement, conducted all US EPA-required reporting, tracked project status and accomplishments in ACRES, performed seven Phase I ESAs, performed five Phase II ESAs and conducted cleanup planning activities associated with several project sites. As of January 1, 2019, MCRDA had

expended more than 70-percent of the grant funds with a clear plan in place to utilize the remaining funds before the grant expiration on September 30, 2019.

For both of the current US EPA grants described above, MCRDA has complied with the Work Plan, schedule, and terms and conditions of the grants. The Assessment Grant performance period was initially set to expire on September 30, 2018; however, a grant extension was issued by US EPA. MCRDA communicated well ahead of time with US EPA regarding the need for a grant extension. MCRDA has made (and has reported on) progress towards achieving the expected results of the grant in a timely and efficient manner. MCRDA's QEP prepared a Program-wide QAPP that was approved by US EPA. Many additional project deliverables have been prepared and submitted to our US EPA Representative, Ms. Gianna Rosati. On-time quarterly and annual reports have been prepared and submitted as required.

Using US EPA RLF Grant (CA BF-973028-01), which was successfully closed in June 2012, MCRDA loaned \$847,000 to abate the boiler house of the former Keasbey & Mattison (K&M) asbestos manufacturing plant in Ambler, Pennsylvania. The project involved adaptive reuse to create 48,000-square feet of LEED-Platinum certified Class A office space. The total cost of the project was more than \$14 million (funds leveraged at a ratio of \$16.53 to each \$1 loaned), and over 320 jobs were created. The Ambler Boiler House office complex is now the largest tax generator in Ambler (\$120,000 annually). Also, repayment of the loaned RLF funds to MCRDA continues to generate program income that is being used for assessment and remediation activities at other brownfields sites in the County.

THRESHOLD CRITERIA RESPONSE

- 1. Statement and Documentation of Applicant Eligibility:** The Redevelopment Authority of the County of Montgomery, Pennsylvania (MCRDA), the applicant, is a redevelopment agency duly formed under the laws of the Commonwealth of Pennsylvania and is eligible for application under EPA's Guidelines for Brownfields Assessment Grants. A copy of MCRDA's Certificate of Incorporation is attached to this Threshold Criteria Response as Exhibit A.
- 2. Description of Community Involvement:** In order to inform and involve the community and other stakeholders in the planning, implementation and other brownfield assessment activities described in this proposal, MCRDA intends to utilize several methods that have proven successful in the past. These methods include actively coordinating and teaming with local community partners who will have meaningful involvement with site selection and assessment, remediation and reuse planning. Pottstown Area Industrial Development, Inc. (PAID), Pottstown Area Health and Wellness Foundation (PAHWF), the TriCounty Area Chamber of Commerce (TCACC), the Latin American Community Action of Montgomery County (ACLAMO) and the Schuylkill River Greenways National Heritage Area (SRG NHA) have been identified as initial community partners with others to be engaged as projects progress.

MCRDA will also develop a Community Engagement Plan consisting of initiatives designed to involve and engage the affected community. Program information and periodic progress updates (quarterly or more frequently if necessary) will be posted on MCRDA and PAID websites and through social media platforms. Publicly advertised outreach meetings with sensitive populations will be hosted as needed and key project stakeholders will be invited to attend. Prior to and during these meetings, community input will be solicited and will be factored into the project decision-making process. A steering committee consisting of MCRDA, PAID and local community representatives will be regularly convened to discuss and guide site selection.

- 3. Documentation of the Available Balance of Community-Wide Assessment Grant No. BF-96337701:** As of December 21, 2018, MCRDA had drawn down \$280,239.31 of the available \$400,000 (70.1%) associated with Grant Number BF-96337701 leaving a remaining balance of \$119,760.69. Documentation regarding the drawdown of funds and remaining grant balance is attached to this Threshold Criteria Response as Exhibit B.

Exhibit A

In the Name and by Authority of the

3-1-58.28 301

Commonwealth of Pennsylvania



DEPARTMENT OF STATE

TO ALL TO WHOM THESE PRESENTS SHALL COME, GREETING:

WHEREAS, In and by the provisions of Urban Redevelopment Law, Act No. 385, approved the twenty-fourth day of May, Anno Domini one thousand nine hundred and forty-five, Pamphlet Laws 991, the Department of State is authorized and required to issue a

CERTIFICATE OF INCORPORATION

evidencing the incorporation of a redevelopment authority under the provisions of said Act.

AND WHEREAS, The stipulations and conditions of said Act have been fully complied with by the Governing Body of the County of Montgomery, by the passage of the proper Ordinance finding and declaring that there is a need for a Redevelopment Authority.

THEREFORE, KNOW YE, That, subject to the Constitution of this Commonwealth, and under the authority of Act No. 385, approved the twenty-fourth day of May, Anno Domini one thousand nine hundred and forty-five, P. L. 991, I DO BY THESE PRESENTS, which I have caused to be sealed with the Great Seal of the Commonwealth, declare and certify the creation, erection and incorporation of

REDEVELOPMENT AUTHORITY OF THE COUNTY OF MONTGOMERY

into a body politic and corporate in deed and in law by the name hereinbefore specified, now to become operative with authority to transact business.

Such corporation shall have and enjoy and shall be subject to all the powers, duties, requirements, and restrictions, specified and enjoined in and by the above Act of Assembly and all other applicable laws of this Commonwealth.

GIVEN under my Hand and the Great Seal of the Commonwealth,
at the City of Harrisburg, this 10th day of November,
in the year of our Lord one thousand nine hundred and
fifty-eight, and of the Commonwealth the one hundred
and eighty-third.



[Signature]

Deputy Secretary of the Commonwealth mem

Exhibit B

Payment Transaction Confirmation

Payment Request Sequence Number : 12-19-2018 26782566

Payment Request Type :	Individual
Payment Method :	ACH
Bank Relationship :	036076150*****4088
Requested Settlement Date :	12/21/2018
Requested Date and Time :	12/19/2018:13:33
Total Items :	1

Recipient : REDEVELOPMENT AUTHORITY OF THE (4224207)

Federal Agency : ENVIRONMENTAL PROTECTION AGENC (68128933)

Cash On Hand : Total :\$13,949.42

Seq # / Item #	Account ID	Account Status	Request Reference Number	Available Balance	Remittance Code	Remittance Amount	Amount Requested	Payment Request Status
00001/1	BF96337701	Open	BAG #13	\$119,760.69				Warehoused
	BF96337701-G300NY00	Open					\$4,566.42	
	BF96337701-G300OR00	Open					\$9,383.00	

Application for Federal Assistance SF-424

* 1. Type of Submission:

- ☐ Preapplication
☒ Application
☐ Changed/Corrected Application

* 2. Type of Application:

- ☒ New
☐ Continuation
☐ Revision

* If Revision, select appropriate letter(s):

* Other (Specify):

* 3. Date Received:

01/30/2019

4. Applicant Identifier:

Brownfields Assessment Grant

5a. Federal Entity Identifier:

5b. Federal Award Identifier:

State Use Only:

6. Date Received by State:

7. State Application Identifier:

8. APPLICANT INFORMATION:

* a. Legal Name:

Redevelopment Authority of the County of Montgomery

* b. Employer/Taxpayer Identification Number (EIN/TIN):

(b) (6)

* c. Organizational DUNS:

0135812490000

d. Address:

* Street1:

104 W. Main Street, Suite 2

Street2:

* City:

Norristown

County/Parish:

Montgomery

* State:

PA: Pennsylvania

Province:

* Country:

USA: UNITED STATES

* Zip / Postal Code:

19401-4738

e. Organizational Unit:

Department Name:

Division Name:

f. Name and contact information of person to be contacted on matters involving this application:

Prefix:

Mr.

* First Name:

John

Middle Name:

F.

* Last Name:

Nugent

Suffix:

Title:

Executive Director

Organizational Affiliation:

* Telephone Number:

610-275-5300

Fax Number:

* Email:

jnugent@montcopa.org

Application for Federal Assistance SF-424

* 9. Type of Applicant 1: Select Applicant Type:

B: County Government

Type of Applicant 2: Select Applicant Type:

Type of Applicant 3: Select Applicant Type:

* Other (specify):

* 10. Name of Federal Agency:

Environmental Protection Agency

11. Catalog of Federal Domestic Assistance Number:

66.818

CFDA Title:

Brownfields Assessment and Cleanup Cooperative Agreements

* 12. Funding Opportunity Number:

EPA-OLEM-OBLR-18-06

* Title:

FY19 GUIDELINES FOR BROWNFIELDS ASSESSMENT GRANTS

13. Competition Identification Number:

Title:

14. Areas Affected by Project (Cities, Counties, States, etc.):

Add Attachment

Delete Attachment

View Attachment

* 15. Descriptive Title of Applicant's Project:

Brownfields Community-Wide Assessment Grant Proposal. Redevelopment Authority of the County of Montgomery

Attach supporting documents as specified in agency instructions.

Add Attachments

Delete Attachments

View Attachments

Application for Federal Assistance SF-424**16. Congressional Districts Of:**

* a. Applicant PA-006

* b. Program/Project PA-006

Attach an additional list of Program/Project Congressional Districts if needed.

Add Attachment

Delete Attachment

View Attachment

17. Proposed Project:

* a. Start Date: 10/01/2019

* b. End Date: 09/30/2022

18. Estimated Funding (\$):

* a. Federal	300,000.00
* b. Applicant	0.00
* c. State	0.00
* d. Local	0.00
* e. Other	0.00
* f. Program Income	0.00
* g. TOTAL	300,000.00

*** 19. Is Application Subject to Review By State Under Executive Order 12372 Process?**

- ☒ a. This application was made available to the State under the Executive Order 12372 Process for review on 01/30/2019 .
- ☐ b. Program is subject to E.O. 12372 but has not been selected by the State for review.
- ☐ c. Program is not covered by E.O. 12372.

*** 20. Is the Applicant Delinquent On Any Federal Debt? (If "Yes," provide explanation in attachment.)**☐ Yes ☒ No

If "Yes", provide explanation and attach

Add Attachment

Delete Attachment

View Attachment

21. *By signing this application, I certify (1) to the statements contained in the list of certifications and (2) that the statements herein are true, complete and accurate to the best of my knowledge. I also provide the required assurances** and agree to comply with any resulting terms if I accept an award. I am aware that any false, fictitious, or fraudulent statements or claims may subject me to criminal, civil, or administrative penalties. (U.S. Code, Title 218, Section 1001)**

☒ ** I AGREE

** The list of certifications and assurances, or an internet site where you may obtain this list, is contained in the announcement or agency specific instructions.

Authorized Representative:

Prefix: Mr. * First Name: John

Middle Name: F.

* Last Name: Nugent

Suffix:

* Title: Executive Director

* Telephone Number: 610-275-5300 Fax Number: 610-275-5145

* Email: jnugent@montpa.org

* Signature of Authorized Representative: John F Nugent * Date Signed: 01/30/2019